

Washington, Phyllis

Washington, Phyllis on 7/23/2014 (30:2-30:7)

2 Q. Okay. And when you got there, you said you
3 had to wait in line?
4 A. I waited in line for a few minutes, and then
5 a lady came over and she said, "Oh, you're in a
6 wheelchair. You're handicap. We can bring you over
7 here."

Washington, Phyllis on 7/23/2014 (33:4-34:10)

4 Q. When you say she said, "You have an ID," did
5 you have an ID with you that day?
6 A. I had it -- no. The Texas ID information was
7 on the computer because I had a Texas ID prior to my
8 illness, years before, due to traveling abroad and
9 stuff. I always had several IDs.
10 Q. So -- so the employee -- the DPS employee
11 told you, if I understand you correctly, that she had
12 a record that at some point you had a Texas ID?
13 A. That's right. On the computer.
14 Q. On the computer. And because of that --
15 A. I got it.
16 Q. -- you could get another ID?
17 A. Right.
18 Q. And all you showed her, if I understand you
19 correctly, was your social security card and the
20 notice you received from DPS that you needed to get a
21 new ID -- driver's license?
22 A. Right. And they updated the information
23 about my -- according to Social Security, I'm not
24 handicap. Disabled. But the handicap situation, they
25 updated that information.

Page 34

1 Q. Okay.
2 A. So they gave a new listing on my ID.
3 Q. So did they give you a new ID that day?
4 A. No. They gave me a receipt for my payment,
5 \$4, and they gave me a paper with the picture on it
6 and all the information; and that's what I was
7 supposed to use as an ID until I received it in the
8 mail.
9 Q. Did you get an ID sometime later in the mail?
10 A. Yes, I did.

Washington, Phyllis on 7/23/2014 (44:13-44:15)

13 Q. Okay. And when you received it this year,
14 did you read both sides of the card?
15 A. No. I didn't read the backside.

Washington, Phyllis on 7/23/2014 (49:1-49:20)

1 Q. Why did you have both a driver's license and
2 a personal identification card?
3 A. Due to my traveling, I always had an ID as an
4 extra picture ID when I leave the United States. So
5 it's more verification.
6 Q. And did you have a passport?



Washington, Phyllis

- 7 A. I had a passport at that time.
8 Q. And when you say "at that time" --
9 A. When I went to Africa, I had a passport.
10 Q. When did you go to Africa?
11 A. Like, four or five years ago, from what I
12 remember. Whenever I went to the islands somewhere,
13 Mexico, I just used my social security and my two IDs.
14 Q. And do you recall when the passport that you
15 had expired, if it expired?
16 A. No, I don't. It's in storage with a lot of
17 other things.
18 Q. So you currently have the passport somewhere
19 in storage?
20 A. Uh-huh.

Washington, Phyllis on 7/23/2014 (49:24-50:4)

- 24 Q. Do you -- do you recall when you first
25 obtained that passport?

.
Page 50
.

- 1 A. I don't know. Either five or six years ago.
2 I'm not sure. It's been quite awhile when I did the
3 traveling. Maybe more than five now that I'm thinking
4 about it.

Washington, Phyllis on 7/23/2014 (67:24-68:6)

- 24 Q. Then the last line on this page, "Expiration
25 date indefinite." Would you agree with me that the

.
Page 68
.

- 1 personal identification card that you have never
2 expires?
3 A. Right. That's what it looks like because it
4 didn't have a date.
5 Q. So it's valid for the rest of your life?
6 A. Right. Uh-huh.

Washington, Phyllis on 7/23/2014 (69:23-70:3)

- 23 Q. I didn't give you the specific date. When
24 you went there December 2013, would you say you had a
25 positive customer experience?

.
Page 70
.

- 1 A. Oh, yes. Very helpful.
2 Q. Would you say the people are very helpful?
3 A. All the time.

Washington, Phyllis on 7/23/2014 (72:3-72:14)

- 3 Do you recall whether you presented your --
4 A. I had ID then.
5 Q. So did you -- which ID did you use in order
6 to vote?
7 A. This one, my identification card.
8 Q. Do you re -- did you have any issues in
9 voting in March 2014?

Washington, Phyllis

10 A. No. And I did vote because I remember we had
11 moved our polls from where it was before to the
12 school, and I was parked in front of the school, and
13 they -- the same gentleman brought the machine out to
14 me who brought it to me in November.

Washington, Phyllis on 7/23/2014 (75:16-75:17)

16 Q. So you voted early several times?
17 A. Uh-huh.

Washington, Phyllis on 7/23/2014 (81:17-81:25)

17 Q. (BY MS. WOLF) So the day that you went to
18 vote, did you read the bottom half of this document
19 below to be completed by the election judge?
20 A. I did not because he told me my
21 responsibility was to fill out the top.
22 Q. Okay. After the day that you went to vote,
23 did you read the bottom half of this document, which
24 says, "To be completed by the election judge"?
25 A. Today, I did.

Washington, Phyllis on 7/23/2014 (86:3-86:14)

3 Q. Okay. Now, I believe you had said that your
4 driver's license had been stolen before; is that
5 correct?
6 A. Yes.
7 Q. Okay.
8 A. Through the years, yes.
9 Q. And when it was stolen previously, you would
10 go and you would get it --
11 A. Renewed, uh-huh.
12 Q. -- renewed? And when you did that, did you
13 have to pay a fee?
14 A. For renew, yes.

Washington, Phyllis on 7/23/2014 (86:22-87:12)

22 Did you have any problems paying that fee?
23 A. No.
24 Q. And do you recall whether that fee was more
25 or less than the fee that you paid in December 2013 to

Page 87

1 get your personal identification card?
2 A. The identification card is less.
3 Q. Okay.
4 A. It was only \$6.
5 Q. And it never expires, correct?
6 A. Right.
7 Q. Okay. And I think you said your son drove
8 you to the polls, and he also drove you to the DPS
9 office, correct?
10 A. Right. Uh-huh.
11 Q. Does your son regularly give you rides?
12 A. Yes. Whenever he can on a regular basis.

Washington, Phyllis on 7/23/2014 (87:24-88:4)

24 Q. And are those rides, typically are they

Washington, Phyllis

25 during the morning or the afternoon?

Page 88

- 1 A. Usually in the morning.
2 Q. Would you say after 8:00 a.m.?
3 A. Yes. He takes me everywhere; doctor's
4 appointments, therapy, everywhere.

Washington, Phyllis on 7/23/2014 (89:18-89:24)

- 18 Q. Did it ever take you an hour and a half to
19 get to work?
20 A. No. About an hour.
21 Q. About an hour?
22 A. The only way it was extended is if I missed
23 the second bus, and you'd have to wait. It depends.
24 It's long and short times during the day.

Washington, Phyllis on 7/23/2014 (90:14-91:8)

- 14 Q. At any time, did you make an effort to get
15 your passport out of storage?
16 A. No.
17 Q. And why did you not make an effort to do
18 that?
19 A. I wasn't traveling out of the country; but if
20 I had, I would have tried to get it.
21 Q. Okay.
22 A. I'd just go get another one, a new one. I
23 don't know the procedures. But they told me I had to
24 get the old one, then I'd go to storage and pull it
25 out.

Page 91

- 1 Q. Well, to go to storage, it's free to get the
2 passport, right, because you already had it?
3 A. Yes. But it takes time. It's filed away
4 with most of my documents from Africa, so...
5 Q. So rather than taking the time, you'd be
6 willing to pay to get a new one?
7 A. Another one, uh-huh. If I'm gonna -- I
8 would.

Washington, Phyllis on 7/23/2014 (91:13-91:18)

- 13 Q. It's this one (indicating). I'm going to ask
14 you to take a look at Exhibit 6, which is the
15 two-sided voter registration cards. Actually, I'll
16 ask you to take a look at first the voter registration
17 card valid from 2012 to 2013. Do you see that?
18 A. Yes.

Washington, Phyllis on 7/23/2014 (91:21-92:16)

- 21 Did you receive this card prior to the
22 November 2013 election?
23 A. Yes, I did.
24 Q. Okay. And did you read both sides of the
25 card?

Washington, Phyllis

Page 92

- .
- 1 A. I didn't read the backside.
- 2 Q. So if you take a look at the backside, you'll
- 3 see in the first paragraph there, would you agree with
- 4 me that a United States passport is a form of
- 5 identification that's listed as something that could
- 6 be used for voting?
- 7 A. I see it.
- 8 Q. Okay. And I'd just ask you to take a look at
- 9 the second document, which is the 2014/2015 voter
- 10 registration card.
- 11 A. Okay.
- 12 Q. And would you -- when you received this card,
- 13 did you read both sides?
- 14 A. No.
- 15 Q. Okay.
- 16 A. I should have. No.

Washington, Phyllis on 7/23/2014 (92:19-92:22)

- 19 Q. And if you look at the second page, would you
- 20 agree with me that a United States passport is one of
- 21 the forms of identification that's listed?
- 22 A. Yes. It says, "Must show." That's it.

Washington, Phyllis on 7/23/2014 (100:19-101:7)

- 19 Q. 105. So there's numbers on the bottom. See
- 20 these numbers? 105 is this one (indicating). Have
- 21 you received any correspondence from Harris County
- 22 regarding the photographic identifications required in
- 23 order to vote?
- 24 A. No, I haven't.
- 25 Q. Okay. Have you received any correspondence

.

Page 101

- 1 from Congressman Al Green regarding the photographic
- 2 identifications required to vote?
- 3 A. No.
- 4 Q. Have you received any correspondence from any
- 5 elected representative regarding the photographic
- 6 identifications required in order to vote?
- 7 A. No.

Washington, Phyllis on 7/23/2014 (107:6-107:8)

- 6 Q. In November 2013, you were over 65; is that
- 7 correct?
- 8 A. Yes.

Washington, Phyllis on 7/23/2014 (109:10-110:12)

- 10 Q. Have you ever had to present a form of
- 11 photographic identification in connection with any
- 12 transaction or issue relating to your home?
- 13 A. Yes. When we claim homestead, you have to
- 14 mail in your ID with your paperwork.
- 15 Q. And when you say "your ID," did you mail in
- 16 your driver's license or your --
- 17 A. A long time ago, the driver's license.

Washington, Phyllis

18 Q. Okay. Do you recall --
19 A. And recently I used my ID, this (indicating).
20 Q. And do you -- you say "recently." When did
21 you claim the homestead recently?
22 A. It was December.
23 Q. Of 2013?
24 A. Yeah. We update it. Uh-huh.
25 Q. And when you went to get the personal

Page 110

1 identification card, did you know that you were going
2 to need a form of identification --
3 A. No.
4 Q. -- to up --
5 A. I didn't even know I was going to do that.
6 Q. How did you -- why did you update your
7 homestead?
8 A. Just looking at files and thinking about it,
9 and I said, "Oh, I need to do this," and I did it.
10 Q. Okay.
11 A. It was something that I realized that day
12 that it was something I wanted to update.

Washington, Phyllis on 7/23/2014 (111:21-111:25)

21 Q. Okay. Have you ever checked into a hotel?
22 A. Yes.
23 Q. And when you did that, did you have to
24 present a form of photographic identification?
25 A. Yes.

Washington, Phyllis on 7/23/2014 (112:6-112:13)

6 Q. Okay. When you entered the building today,
7 this U.S. attorney's office, did you have to --
8 A. Security, yes.
9 Q. Did you present a form of photograph
10 identification?
11 A. Yes.
12 Q. Did you use your Texas identification card?
13 A. Yes. Uh-huh.

Washington, Phyllis on 7/23/2014 (114:15-114:18)

15 Q. But I'm just trying to get a handle on when
16 you traveled because I think you had earlier testified
17 that you went to Africa maybe four or five years ago.
18 A. Right. Five. Uh-huh.

Washington, Phyllis on 7/23/2014 (117:16-117:18)

16 Q. Okay. Do you have the vehicle registration
17 for your car?
18 A. Yes.

Washington, Phyllis on 7/23/2014 (118:7-118:13)

7 Q. Okay. Do you still have a physical copy of
8 the documents?
9 A. Yes.
10 Q. Okay. And which one, a marriage license?
11 A. Divorce.

Washington, Phyllis

- 12 Q. Divorce decree?
13 A. (Nodding head.)

Washington, Phyllis on 7/23/2014 (120:16-120:17)

- 16 Q. Do you have a Medicare card?
17 A. Yes.

Washington, Phyllis on 7/23/2014 (121:9-122:17)

- 9 Q. Okay. Do you have a hospital-issued birth
10 record from when you were born?
11 A. Yes. I know what you're talking about. I
12 got one for record's sake awhile ago, but it's in
13 storage. I don't have one where it's accessible.
14 Q. What did you do to obtain that?
15 A. I went to the bureau and filled out a card
16 for it.
17 Q. Which bureau?
18 A. The statistics bureau.
19 Q. So is that a --
20 A. Vital statistics.
21 Q. So is that a hospital-issued birth record or
22 is that a birth certificate?
23 A. It's a birth certificate.
24 Q. So you have a certified -- is it a certified
25 copy?

.
Page 122
.

- 1 A. Yes.
2 Q. Okay. So there's a certified copy of your
3 birth certificate in storage?
4 A. Right.
5 Q. And you say "for record's sake." What do you
6 mean by that?
7 A. Just historical sake. Let's say when my
8 mother died many years ago, I went to get her death
9 certificate, and then I said, "Oh, I'll get my birth
10 certificate."
11 Q. Okay.
12 A. Just to have it.
13 Q. Okay. Have you ever used it for any purpose?
14 A. I've never used it.
15 Q. Was it a problem for you to pay the fee to
16 get the birth certificate?
17 A. No.

Washington, Phyllis on 7/23/2014 (122:23-122:25)

- 23 Q. Do you currently have copies of current
24 bills?
25 A. Uh-huh.

Washington, Phyllis on 7/23/2014 (123:19-123:24)

- 19 Q. Okay. Do you have any checking, savings,
20 investment accounts, or credit card statements
21 currently?
22 A. No credit cards. Savings and 401.
23 Q. Okay. So you have statements from the banks?
24 A. A couple, yes.

Washington, Phyllis

Washington, Phyllis on 7/23/2014 (147:13-147:25)

13 Q. When did you travel to Africa?

14 A. I wish I knew the exact year.

15 Q. Roughly.

16 A. I don't know. About five -- five, seven

17 years ago. I'm not sure.

18 Q. Could be as long as seven years ago?

19 A. It could be. I'm not sure. It's been

20 awhile. I can't remember.

21 Q. I believe you indicated that your passport
22 may be expired?

23 A. It might be, but if I needed one, I'll just
24 go get a new one. Whatever it costs, I'll just get
25 another one.